



Advocates for Workplace Fairness

October 1, 2023

**Via ECF:**

The Honorable Jennifer H. Rearden  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**Re: Ulku Rowe v. Google LLC, Case No. 19-cv-08655**

Dear Judge Rearden:

We represent Plaintiff Ulku Rowe in the above-referenced matter. We write to briefly correct two inaccuracies in Defendant's September 29, 2018 letter to the Court. (ECF No. 319).

First, Defendant states that Will Grannis is not a party witness. (*Id.*, at 1.) This is incorrect; as Vice President and Chief Technology Officer of Google Cloud, he is one of Google Cloud's key officers. (See <https://craft.co/google-cloud-platform/executives>.)<sup>1</sup>

Second, Defendant's representation of the expected duration of Plaintiff's case is inaccurate. Plaintiff's truncation of her case to fit within the Court's 12-hours allocation means that Will Grannis and Tariq Shaukat are the witnesses with the most significant and material testimony, following Ms. Rowe's. Their testimony now necessarily covers a broader range of topics than it might otherwise have, to compensate for witnesses with whom Plaintiff will not have sufficient time to explore those topics, or who she has decided not to call at all.

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<sup>1</sup> Not a Google website. We also note that Google has submitted a declaration from someone other than Mr. Grannis to support Google's assertions with respect to the criticality of the offsite and Mr. Grannis's participation.

Hon. Jennifer H. Rearden

October 1, 2023

Page 2

As a result of Plaintiff's witness reconfiguration, Mr. Grannis's and Mr. Shaukat's testimony is likely to take up far more trial time than any other witness besides Ms. Rowe. From a trial-planning perspective, Plaintiff disagrees with Defendant's time assessment and believes it is very likely that, if Mr. Grannis and Mr. Shaukat testify in the second week of trial, she may not have enough witness testimony time to fill October 6, placing the parties in a position of either not using valuable court time on that day, or having Defendant begin its case before Plaintiff's case is concluded. The latter scenario presents the very likely risk of juror confusion resulting in severe prejudice to Plaintiff.

As we state in our September 28, 2023 letter (ECF No. 317), we respectfully request that the Court compel the presence of both Mr. Grannis and Mr. Shaukat in the first week of trial.

Respectfully submitted,

/s/ Gregory Chiarello  
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c: All Parties via ECF